

Deverie J. Christensen, NV SBN 6596  
Lynne K. McChrystal, NV SBN 14739  
**JACKSON LEWIS P.C.**  
300 S. Fourth Street, Suite 900  
Las Vegas, Nevada 89101  
Tel: (702) 921-2460  
Fax: (702) 921-2461  
Email: [deverie.christensen@jacksonlewis.com](mailto:deverie.christensen@jacksonlewis.com)  
Email: [lynne.mcchrystal@jacksonlewis.com](mailto:lynne.mcchrystal@jacksonlewis.com)

Attorneys for Defendant  
TIJUANA, LLC

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

RUDI JIMENEZ,

Plaintiff,

vs.

TIJUANA, LLC, d/b/a ADVANCE MEDICAL  
STAFFING, d/b/a RAPID TEMPS, INC., a  
domestic limited liability company; DOES I-X;  
and ROE BUSINESS ENTITIES I-X,  
inclusive,

Defendants.

Case No.: 2:20-cv-00765-RFB-VCF

**ORDER GRANTING STIPULATION  
TO EXTEND TIME TO FILE  
STIPULATION OF DISMISSAL**

**[SECOND REQUEST]**

Defendant TIJUANA, LLC d/b/a ADVANCE MEDICAL STAFFING (“Defendant”), improperly named as TIJUANA, LLC, d/b/a ADVANCE MEDICAL STAFFING, d/b/a RAPID TEMPS, INC., (“Tijuana” or “Defendant”), by and through its counsel of record, Jackson Lewis P.C., and Plaintiff RUDI JIMENEZ (“Plaintiff”), by her counsel of record, Maier Gutierrez & Associates, hereby submit the following Stipulation to Extend Time to File a Stipulation of Dismissal pursuant to the settlement reached in the instant case. Docket No. 27.

The Court previously granted an extension of the deadline from September 2, 2020, to October 2, 2020. Docket No. 29. At the time of the first request, the Parties were still finalizing the terms of the agreement. As of the date of the filing of this request, the Parties have executed a formal confidential settlement agreement. The Parties anticipate that the remaining obligations under the settlement agreement will be completed within 30 days of this request. The Parties,

1 therefore, respectfully request that this Court extend the deadline to file the Stipulation of  
2 Dismissal to November 2, 2020.

3 Dated this 2<sup>nd</sup> day of October, 2020

4 MAIER GUTIERREZ & ASSOCIATES

JACKSON LEWIS P.C.

5 /s/ Joseph N. Mott

/s/ Lynne K. McChrystal

6 Joseph A. Gutierrez, NV SBN 9046

Deverie J. Christensen, NV SBN 6596

7 Joseph N. Mott, NV SBN 12455

Lynne K. McChrystal, NV SBN 14739

8 Danielle J. Barraza, NV SBN 13822

300 S. Fourth Street, Suite 900

8816 Spanish Ridge Avenue

Las Vegas, Nevada 89101

Las Vegas, Nevada 89148

Attorneys for Defendant

9 Attorney for Plaintiff

10  
11  
12  
13 **ORDER**

14 IT IS SO ORDERED.

15  
16   
United States Magistrate Judge

17 Dated: October 9, 2020

18  
19 4838-4823-3933, v. 1